

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
(Eastern Division)

CHARLES C. JOHNSON and
GOT NEWS, LLC

Plaintiffs,

v.

GAWKER MEDIA, LLC, J.K. TROTTER,
and GREG HOWARD

Defendants.

Case No. _____

DECLARATION OF JOSEPH E. MARTINEAU

I, JOSEPH E. MARTINEAU, declare as follows:

1. I am a Member of the firm of Lewis Rice LLC and serve as counsel to Defendants Gawker Media, LLC, Joseph Keenan Trotter, and Gregory Howard in the above-captioned matter. I submit this declaration to place before the Court exhibits referenced herein and to identify the citizenship of the plaintiffs herein.

2. Attached to the Notice of Removal herein as **Exhibit A** are true, genuine and accurate copies of the Petition of Plaintiffs Charles C. Johnson and Got News, LLC and related materials filed in the above-captioned matter in the 21st Judicial Circuit Court, St. Louis County, Missouri, which I obtained off the Missouri CaseNet system.

3. On Monday, July 20, 2015, in a telephone call with John Burns, counsel for Plaintiffs, Mr. Burns confirmed to me that the sole member of Got News, LLC is Charles C. Johnson and that Mr. Johnson is a citizen of the State of California.

NOTICE OF REMOVAL
EXHIBIT B

4. Attached hereto as **Exhibit 1** is a true and accurate copy of the complaint of Plaintiff Charles C. Johnson filed in *Johnson v. Fox, et al.*, No. 14SL-CC02844 (St. Louis Cnty Aug. 21, 2014).

5. Attached hereto as **Exhibit 2** is a true and accurate copy of the California Secretary of State's Business Entity Detail for Got News, LLC, Entity No. 201415010192.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 23, 2015

/s/ Joseph E. Martineau

JOSEPH E. MARTINEAU